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IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

SOUTHERN DIVISION

IN RE:

WAREHOUSE 86, LLC

DEBTOR

CASE NO. 08-03423 EE

CHAPTER 7

TRUSTEE'S APPLICATION FOR EMPLOYMENT OF COUNSEL

Kimberly R. Lentz, Chapter 7 Trustee, in the above styled bankruptcy proceeding, and files

this her application for the employment of counsel on a general retainer, and in support of same

would show unto the Court that this cause appears to be an asset case wherein the Trustee will

require the advice and assistance of counsel.

1.

That the Trustee has selected Kimberly R. Lentz, Attorney with the Law Firm of Lentz &

Little, PA, for the reason that she has considerable experience in matters of this character and is well

qualified to represent the Trustee.

WHEREFORE, PREMISES CONSIDERED, the Trustee, Kimberly R. Lentz, would pray

that the Court appoint Kimberly R. Lentz, Attorney with the Law Firm of Lentz & Little, PA, duly

licensed and qualified to practice before this Honorable Court, to act as attorneys for the Trustee, on

a general retainer. Your Trustee would further pray for such other and further relief as is just and

proper in the premises.

Respectfully Submitted, KIMBERLY R. LENTZ, TRUSTEE

By: /s/ Kimberly R. Lentz

KIMBERLY R. LENTZ, (BAR NO. 8986)

OF COUNSEL:

Lentz & Little, PA Post Office Box 927 Gulfport, Mississippi 39502 Telephone (228) 867-6050 Facsimile (228) 867-6077 08-03423-ee Dkt 318 Filed 01/24/11 Entered 01/24/11 12:55:48 Page 2 of 3

CERTIFICATE OF SERVICE

I, KIMBERLY R. LENTZ, do hereby certify that the following have been served electronically via ECF with a copy of the foregoing document:

United States Trustee: <u>USTPRegion05.JA.ECF@usdoj.gov</u> Christopher R. Maddux, Attorney for Debtor: <u>chris.maddux@butlersnow.com</u> John A. Crawford, Jr., Attorney for Debtor: <u>jack.crawford@butlersnow.com</u> Stephen W. Rosenblatt, Attorney for Debtor: <u>Steve.Rosenblatt@butlersnow.com</u>

I further certify that I mailed a true and correct copy of the foregoing document to:

Warehouse 86, LLC. Post Office Box 16692 Jackson, MS 39236

This the 24th day of January, 2011.

<u>/s/ Kimberly R. Lentz</u> KIMBERLY R. LENTZ

IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI SOUTHERN DIVISION

IN RE:

WAREHOUSE 86, LLC

DEBTOR

CASE NO. 08-03423 EE

CHAPTER 7

DECLARATION OF PROPOSED COUNSEL FOR TRUSTEE

- My name is KIMBERLY R. LENTZ. I am over 21 years of age and am competent to make this Declaration pursuant to the requirements of Rule 2014 of the Federal Rules of Bankruptcy Procedure.
 - 2. I have personal knowledge of all facts stated in this Declaration.
- 3. I am a member of the firm of Lentz & Little, PA, a professional association ("Lentz"), and am located in the firm's offices at 2012 23rd Avenue, Gulfport, Mississippi.
- This Declaration is filed in connection with the Trustee's Application for Employment of Counsel, filed with the Court by the Trustee.
- 5. I am a member in good standing of the State Bar of Mississippi and duly admitted to practice in the United States District Courts for the Northern and Southern Districts of Mississippi.
- 6. Except as set forth herein, that neither the firm nor I, to the best of my knowledge, have any connection or affiliation with the Debtor's, creditors, and any party in interest appearing in this case. Based upon investigation and to the best of my present knowledge and belief, the firm does not have any connection with the Debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee except that Kimberly R. Lentz, an employee, officer, shareholder and director of Lentz & Little, PA is a Chapter 7 panel trustee serving in this Judicial District and is serving as Chapter 7 Trustee in this case.
- 7. I declare under penalty of perjury that the above and foregoing statements are true and correct, to the best of my knowledge, information and belief.

DATED:

This the 24th day of January, 2011.

Ву:___

KIMBERLY R. LENTZ

PROPOSED COUNSEL FOR THE TRUSTEE

STATE OF MISSISSIPPI COUNTY OF HARRISON

Personally appeared before me, the undersigned authority in and for the said county and state, on this 24th day of January, 2011, within my jurisdiction, the within named Kimberly R. Lentz, who acknowledged that she executed the above and foregoing instrument.

NOPARY PUBLIC

My Commiss

MICHELLE BETZ

ommission Expire